

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>TERI RENE EDWARDS</b>	§	
	§	
<b>VS.</b>	§	<b>CASE NO. 4:23-CV-2037</b>
	§	
	§	
<b>AMAZON LOGISTICS, INC</b>	§	
<b>AMAZON.COM SERVICES, LLC.</b>	§	
<b>AMAZON.COM INC</b>	§	

**UNOPPOSED MOTION TO SUBSTITUTE COUNSEL**

COME NOW, **AMAZON LOGISTICS, INC, AMAZON.COM SERVICES, LLC & AMAZON.COM, INC** (“Defendants” or “Amazon”) and file this Motion to Substitute Counsel and would show the Court as follows:

**AMAZON** desires to substitute Warren T. McCollum of the Law Firm of Fenley & Bate, LLP for Laura S. Favaloro, of the Law Firm of Wilson Elser Moskowitz, Edelman & Dicker LLP.

**I.**

Laura S. Favaloro and the law firm of Wilson Elser Moskowitz Edelman & Dicker LLP, LLP request that the Court discharge them from representation of **AMAZON** in this matter. Warren T. McCollum of Fenley & Bate, LLP, will be lead Counsel for **AMAZON** in the above-entitled matter going forward.

**II.**

This Motion is not brought for delay and has been brought prior to the Management Conference in the above-entitled matter.

WHEREFORE PREMISES CONSIDERED, **AMAZON LOGISTICS, INC, AMAZON.COM SERVICES, LLC & AMAZON.COM, INC.** respectfully request that the Court grant their Motion to Substitute Counsel Warren T. McCollum of the Law Firm of Fenley & Bate, LLP, as attorney of record for **AMAZON LOGISTICS, INC, AMAZON.COM SERVICES, LLC & AMAZON.COM, INC.** and discharge Laura Favaloro of Wilson Elser Moskowitz Edelman & Dicker, LLP, from representation of **AMAZON LOGISTICS, INC, AMAZON.COM SERVICES, LLC & AMAZON.COM, INC.** The Defendants request any further relief to which they have shown themselves to be justly entitled.

Respectfully Submitted:

/s/Warren T. McCollum  
WARREN T. MCCOLLUM  
Texas SBN: 24013127  
FRED WILSON  
Texas SBN: 00788687  
FENLEY & BATE, L.L.P.  
P.O. Box 450  
Lufkin, Texas 75902-0450  
TPN: (936) 634-3346  
FXN: (936) 639-5874  
TXSD Admission No.: 769985  
Email: [wmccollum@fenley-bate.com](mailto:wmccollum@fenley-bate.com)

ATTORNEY FOR DEFENDANT  
**AMAZON.COM SERVICES LLC.**  
**AMAZON LOGISTICS, INC**  
**AMAZON.COM, INC**

**CERTIFICATE OF SERVICE**

This is to certify that I have on this the 27<sup>th</sup> day of July 2023, served a true and correct copy of the foregoing to:

Jonathan Sneed  
State Bar No. 89994  
800 Commerce St.  
Houston, Texas 77002  
Email: [jsneed@awtxlaw.com](mailto:jsneed@awtxlaw.com)

<input type="checkbox"/>	By certified mail
<input type="checkbox"/>	By regular mail
<input type="checkbox"/>	By overnight mail
<input checked="" type="checkbox"/>	By Email
<input type="checkbox"/>	By Facsimile
<input type="checkbox"/>	By Electronic Delivery

**CERTIFICATE OF CONFERENCE**

The undersigned conferred with Jonathan Sneed on July 26, 2023. Mr. Sneed advised that he was unopposed to the Motion to Substitute Counsel.

/s/Warren T. McCollum  
WARREN T. MCCOLLUM